### **COUNTY OF LOS ANGELES**

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### DEPARTMENT OF MENTAL HEALTH

http://dmh.lacounty.gov

February 14, 2007

TO:

Chief Executive Officer

Legal Entity Providers

FROM:

Marvin J. Southard, D.S.W.

Director of Mental Health

SUBJECT:

NATIONAL PROVIDER IDENTIFIER (NPI) IMPLEMENTATION

The Los Angeles County Department of Mental Health (DMH), as a covered entity, must comply with the Health Insurance Portability and Accountability Act (HIPAA) National Provider Identifiers (NPI) requirements, as of May 23, 2007.

As a contractor for the Department of Mental Health, you are considered a "covered entity" and must also implement the HIPAA NPI requirements as of May 23, 2007. Enclosed for your reference is a brief fact sheet about NPIs. The Federal Register excerpt that covers the final rules associated with the NPI and additional information can be obtained by accessing the CMS web site at:

# http://www.cms.hhs.gov/NationalProvidentStand/

Please consult your legal counsel, your computer technology consultants, your fiscal/business consultants, and other advisors for implementation of the NPI requirements.

DMH has been working with the State to determine what the NPI needs are for the State billing system. The State has been very slow to provide information; however, we have been able to ascertain the following:

- NPIs will be <u>required</u> for each (4-digit) Medi-Cal Provider Number. This is an
  organizational NPI or a type 2 NPI. Note: the claiming system can only accommodate
  one NPI per provider number with the same address. This means that if you have two
  programs at one address, and only one provider number for the address, there can be
  only one NPI. However, if there are two provider numbers, one for each program, at the
  single address, then there must be two NPIs.
- As of this date, the State has determined an NPI will be required for satellite providers.
   DMH is requesting legal entities to obtain an NPI for each satellite assigned to your legal entity.

- An NPI will be required for each rendering service provider. This is an individual or a type 1 NPI. This includes any licensed or unlicensed individual who delivers direct services which are reimbursed by an external payor.
- Counties will be required to submit to the State their type 2 NPI for each Medi-Cal Provider Number for which they will be submitting electronic claims. As DMH submits claims for its contractors this means we must receive from each legal entity its type 1 and type 2 NPIs.
- All electronic claims submitted will require a valid type 1 and type 2 NPI.
- As of February 5, 2007, the State plans to collect individual NPIs from the electronic claim.
- DMH will post a revised Companion Guide on the Integrated System (IS) web site as soon as it becomes available so that our Electronic Data Interchange (EDI) providers can modify their systems to add the NPI(s) and begin testing.

If you have not already done so, DMH is requesting that you apply for your non-individual (type 2) NPIs using the National Plan and Provider Enumeration System (NPPES). You should retain for audit a copy of each page of the application for a non-individual NPI, including the tracking number assigned when the application is submitted. The tracking number is required should there be a need to contact NPPES in the event an NPI is not issued in a timely manner (issuance may take up to 20 working days). Also, the user name and password used in the application process should be retained to enable you to access the NPI application for purposes of correcting or updating information.

Again, if you have not already done so, please apply for, or have your rendering service providers apply for their individual (type 1) NPIs using the NPPES. You may want to inform your rendering service providers that the NPI belongs to the individual care giver and is not tied to a particular practice location or employer. The NPI is assigned for life and is deactivated only under the most extreme circumstances.

Rendering service providers should also maintain a copy of each page of their application, including the tracking number assigned when the application is submitted, and their user name and passwords to be able to access their NPI application for purposes of correcting or updating information.

The web site address for NPPES is:

## https://nppes.cms.hhs.gov/NPPES/Welcome.do

Regardless of the type of NPI that is being applied for, the applicant must provide a taxonomy. A taxonomy for non-individuals designates the type of the service site; whereas the taxonomy for individuals designates the discipline or credentials held by the applicant. The complete taxonomy listing web site is available at:

http://www.wpc-edi.com/taxonomy

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As stated above, counties will be required to submit an NPI for each provider number that will be used in claiming. Attachments 1 and 2 are to be used to provide the County DMH with needed NPI information. These attachments are provided to CEOs of your legal entity as an excel spreadsheet via email only.

Attachment 1 (tab 1 of the excel spreadsheet) will be used for the type 2, non-individual NPI including satellites.

Please enter in the spreadsheet the NPI, the taxonomy, and the effective date for each type 2 NPI. This spreadsheet contains information in the IS effective February 7, 2007. If your provider number and related information is not listed in the spreadsheet, please DO NOT ADD THE INFORMATION. Please e-mail Chuan Sun at <a href="mailto:csun@lacdmh.org">csun@lacdmh.org</a>. Chuan will provide you with the procedure for giving us NPI information for a provider which is unlisted.

Attachment 2 (tab 2 of the excel spreadsheet) will be used for the type 1, individual NPIs. Please enter in the spreadsheet the NPI, the taxonomy, and the effective date for each rendering service provider. If a rendering provider is no longer working at your legal entity, please enter a termination date. If a rendering provider is not listed in the spreadsheet, please DO NOT ADD HIS/HER NAME, complete a rendering provider form and include the NPI effective date on the form. The completed rendering provider forms should be mailed to:

County of Los Angeles - Department of Mental Health
Chief Information Office Bureau
Provider Maintenance and System Access
695 S. Vermont Avenue
Los Angeles, CA 90005

Attachment 1, Organizational (non-Individual) NPIs must be received on or before March 23, 2007:

- E-mail the completed spreadsheet, Attachment 1, to Judith Weigand at: <u>jweigand@lacdmh.org</u>
- Keep a copy of each confirmation letter assigning your type 2 NPI from the NPPES for records, audits, and annual Medi-Cal Certifications. Mail a copy of each confirmation letter assigning your type 2 NPIs to the address below:

County of Los Angeles – Department of Mental Health Compliance Program Office – 10<sup>th</sup> Floor 550 S. Vermont Avenue Los Angeles, CA 90020

 An e-mail confirmation will be sent when we receive both the completed spreadsheet and the NPI confirmation letters.

It is critical that we receive your type 2 NPIs on or before March 23, 2007, in order to be able to timely enter the type 2 non-individual NPIs into the DMH IS billing system and the State system. There will be edits in the County DMH IS and the State's system that will reject claims that do

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not have an NPI as of May 23, 2007. Failure to submit type 2, non-individual, NPIs timely could therefore impact your reimbursement.

Attachment 2, Individual NPIs must be received on or before March 30, 2007:

- E-mail the completed spreadsheet, Attachment 2, to Judith Weigand at: jweigand@lacdmh.org
- Keep a copy of each confirmation letter assigning the type 1 NPIs from the NPPES for records, audits, and annual Medi-Cal Certifications.
- DO NOT MAIL copies of the NPI confirmation letters for type 1 NPIs.
- An e-mail confirmation will be sent when we receive the completed spreadsheet.

There will be edits in the County DMH IS and the State's system that will reject claims that do not have an NPI effective May 23, 2007. Failure to submit type 1, individual, NPIs timely could therefore impact your reimbursement.

Again, DMH must have 100 percent compliance so that all claims for reimbursement to Medi-Cal can continue without interruption.

Should you have any concerns or questions, please contact Judith Weigand by e-mail at <a href="mailto:jweigand@lacdmh.org">jweigand@lacdmh.org</a> or by phone at (213) 639-6391.

MJS:JVW:tld

### Attachment

| C: | Anita Lee, County Counsel<br>Sheila Shima<br>Roderick Shaner<br>Deputy Directors | Robert Greenless<br>DonnaKay Davis<br>John Ortega<br>Larry Wicker | Nancy Butram<br>Virginia Borrero<br>Judith Weigand |
|----|--|---|--|
|    | Deputy Directors   | Larry wicker  |  |